IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE

B.P., H.A., and S.H., individually, and on	J	
behalf of all others similarly situated,	1	
•	ĺ	
Plaintiffs,	į	No.: 2:23-cv-00071-TRM-JEM
]	
V.]	PLAINTIFFS' DEMAND
	Ī	JURY TRIAL
CITY OF JOHNSON CITY, TN., et al.,	j	
	1	
Defendants.	j	

NOTICE OF SERVICE OF DEFENDANT CITY OF JOHNSON CITY, TENNESSEE'S RESPONSE TO PLAINTIFFS' FIRST SET OF INTERROGATORIES AND THIRD AND FOURTH REQUESTS FOR PRODUCTION OF DOCUMENTS

The Defendant, Johnson City, Tennessee, hereby appears, by and through counsel and provides this Court Notice that Defendant's Response to Plaintiffs' First Set of Interrogatories and Third and Fourth Requests for Production of Documents and accompanying exhibits were provided to all counsel of record via e-mail on this the 5th day of April 2024.

Respectfully submitted this 5th day of April, 2024.

CITY OF JOHNSON CITY, TN

By:s/ Emily C. Taylor

Emily C. Taylor, BPR # 027157 WATSON, ROACH, BATSON & LAUDERBACK, P.L.C.

P.O. Box 131

Knoxville, TN 37901-0131

Phone: (865) 637-1700

Email: etaylor@watsonroach.com

K. Erickson Herrin, BPR # 012110 **HERRIN, McPEAK & ASSOCIATES** 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629

Phone: (423) 929-7113

Email: lisa@hbm-lawfirm.com

Jonathan P. Lakey, BPR # 016788 **BURCH, PORTER & JOHNSON, PLLC** 130 North Court Avenue Memphis, TN 38103 Phone: (901) 524-5024

Email: jlakey@bpjlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system:

Heather Moore Collins
Ashley Shoemaker Walter
HMC CIVIL RIGHTS LAW, PLLC
7000 Executive Center Drive, Suite 320
Brentwood, TN 37027
heather@hmccivilrights.com
ashley@hmccivilrights.com
Counsel for Plaintiffs

Kristin Ellis Berexa
Ben C. Allen
FARRAR BATES BEREXA
12 Cadillac Drive, Suite 480
Brentwood, TN 37027-5366
kberexa@fbb.law
ballen@fbb.law
Counsel for Toma Sparks in his individual
capacity

Vanessa Baehr-Jones ADVOCATES FOR SURVIVORS OF ABUSE, PC 4200 Park Boulevard No. 413 Oakland, CA 94602 vanessa@advocatesforsurvivors.com Counsel for Plaintiffs

Kevin Osborne
Elizabeth Kramer
Julie Erickson
ERICKSON KRAMER OSBORNE, LLP
44 Tehama Street
San Francisco, CA 94105
kevin@eko.law
elizabeth@eko.law
julie@eko.law
Counsel for Plaintiffs

Dated this 5th day of April, 2024.

Daniel H. Rader III
Daniel H. Rader IV
André S. Greppin
MOORE, RADER & YORK PC
46 N. Jefferson Avenue
P.O. Box 3347
Cookeville, TN 38502-3347
danrader@moorerader.com
danny@moorerader.com
andre@moorerader.com
Counsel for Kevin Peters in his individual
capacity

Keith H. Grant
Laura Beth Rufolo
Philip Aaron Wells
ROBINSON, SMITH & WELLS, PLLC
Suite 700, Republic Centre
633 Chestnut Street
Chattanooga, TN 37450
kgrant@rswlaw.com
lrufolo@rswlaw.com
awells@rswlaw.com

s/Emily C. Taylor

Emily C. Taylor, BPR # 027157

Phone: (865) 637-1700

Email: etaylor@watsonroach.com